

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KIARA PERALTA and NAHOMI DAVID,
individually and on behalf of all others
similarly situated,

Plaintiffs,

-against-

CLAIRE’S BOUTIQUES, INC.,

Defendant.

DECLARATION OF
MICHAEL C. SCHMIDT

22-CV-04864 (ALC)

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MICHAEL C. SCHMIDT, declares under penalty of perjury pursuant to 28 U.S.C. § 1746
as follows:

1. I am an attorney admitted to practice before this Court, and am a member of the law firm of Cozen O’Connor, counsel for Defendant Claire’s Boutiques, Inc. (“Claire’s”) in the above-captioned action. I respectfully submit this declaration in support of Claire’s instant motion for an order pursuant to Rule 12 of the Federal Rules of Civil Procedure dismissing the Amended Complaint.

2. I have annexed hereto a true and accurate copy of the following exhibits in support of Claire’s motion:

Exhibit A. Plaintiffs’ Amended Complaint (clean version)

Exhibit B. Plaintiffs’ Amended Complaint (comparison version to initial pleading)

Dated: New York, New York
October 25, 2022



Michael C. Schmidt (MS7841)